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January 15, 2015

DSM Coating Resins

DSM Coating Resins, Inc.
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Info.DCR@dsm.com**By Courier**TSCA Confidential Business Information Center (7407M)
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
WJC East Building, Room 6428, Attn: Section 8(e)
Washington, D.C. 20004-3302**Re: Submission under TSCA § 8(e)**

In accordance with section 8(e) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2607(e), DSM Coating Resins, Inc. ("DSM") hereby submits the results of a freshwater algal growth inhibition test with AgiSyn 740,¹ which DSM obtained on December 22, 2014. DSM has timely filed the study results TSCA § 8(e), specifically, within 30 calendar days of obtaining the results on December 22, 2014 (i.e., by January 21, 2015).

DSM does not expect any significant environmental exposure to or release of AgiSyn 740 from the manufacture or processing of AgiSyn 740 or from its use in ultraviolet-curable coatings in industrial facilities under highly controlled conditions. For this reason, DSM does not believe that the study results reported in this letter constitute "substantial risk information" under TSCA § 8(e). Nonetheless, DSM is reporting the study results to EPA under section 8(e) in an abundance of caution.

Study Results

From October 28 to November 20, 2014, WIL Research Europe B.V. ("WIL") conducted the study with AgiSyn 740 and *Pseudokirchneriella subcapitata* in compliance with OECD Guideline for the Testing of Chemicals Number 201 ("Freshwater Alga and Cyanobacteria, Growth Inhibition Test"). WIL exposed six replicates of exponentially growing algal cultures to a control, and WIL exposed three replicates per group to water-accommodated fractions prepared at loading rates of 0.20, 0.65, 2.0, 6.5, 20, and 65 mg/l of AgiSyn 740. The initial cell density was 10⁴ cells/ml, and the total exposure period was 72 hours.

WIL determined that AgiSyn 740's EL₅₀ for growth-rate inhibition (72h-ER_{C50}) was 16 mg/l with a 95% confidence interval ranging from 13 to 20 mg/l. WIL determined that AgiSyn 740's EL₅₀ for yield inhibition (72h-E_YC₅₀) was 6.1 mg/l with a 95% confidence interval ranging from

¹ Premanufacture Notice Number P-12-0474, "ultraviolet curable acrylate" (generic name).



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5.1 to 7.3 mg/l. In addition, WIL determined that the 72-hour no-observable-effect loading rate for growth-rate inhibition was 2.0 mg/l and for yield inhibition was 0.65 mg/l.

Please contact me with any questions regarding this submission. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. D. Gasper". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

James D. Gasper
Regulatory Affairs Manager
DSM Resin Coatings, Inc.

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